

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Todd M. Swensen
Assistant United States Attorney
402 E. Yakima Avenue, Suite 210
Yakima, Washington 98901
(509) 454-4425

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

1:21-CR-02055-SMJ-1

Plaintiff,

V.

BEVERLEIGH QUENAN PETERSON,

UNITED STATES' SENTENCING MEMORANDUM

Defendant.

The United States of America, by and through Vanessa R. Waldref,
United States Attorney for the Eastern District of Washington, and Todd M.
Swensen, Assistant United States Attorney, submits the following United States'
Sentencing Memorandum.

I. Base Offense Level & Enhancements:

The Defendant pled guilty to Theft of Government Funds, in violation of 18 U.S.C. §641. The United States has no objections to the Presentence

Investigation Report (PSIR) (ECF 26), which provides for a base offense level of 6, with a total offense level of 10. The United States concurs with the PSIR's Total Offense Level calculation. The statutory maximum term of imprisonment is not more than 10 years and/or a \$250,000.00 fine. 18 U.S.C. § 641. The Guideline range is 6-12 months, with a criminal history category of I. The United States concurs with the PSIR that no Chapter Four enhancement apply here.

II. Departures:

The United States concurs with Paragraph 111 of the PSIR with regard to factors warranting departure.

III. 18 U.S.C. § 3553(a):

The United States concurs with Part F of the PSIR with regard to the factors set forth in 18 U.S.C. § 3553(a).

IV. Sentencing Recommendation

The United States recommends that the Defendant be sentenced to three years of probation.

DATED this 1st day of June 2022.

VANESSA R. WALDREF
United States Attorney

s/ Todd M. Swensen
TODD M. SWENSEN
Assistant United States Attorney

1 I hereby certify that on June 1, 2022, I electronically filed the foregoing with
2 the Clerk of the Court using the CM/ECF System, and a copy was emailed to the
3 counsel of record in this case: Alex B. Hernandez, III.
4
5

6 s/ Todd M. Swensen
7 Todd M. Swensen
8 Assistant United States Attorney
9 United States Attorney's Office
10 402 E. Yakima Ave., Suite 210
11 Yakima, WA 98901
12 (509) 454-4425
13 Fax: (509) 249-3297
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28